From: Cook, Brenda

To: Stenger, Wren; Delgado, Paige; Webster, Susan; Khoury, Ghassan; Banipal, Ben; Canellas, Bart

Subject: Review of available file information for Camp Minden/Explo for potential NPL Consideration

Date: Monday, January 28, 2013 9:04:46 AM
Attachments: EXPLO Minden, LA - Google Maps.pdf
EXPLO Systems Incorporated Jan 24.docx

EXPLOLDEQ1.pdf
EXPLOLDEQ2.pdf

Hi Wren.

I reviewed the information supplied to me by Paige (thank-you Paige), the Louisiana LDEQ EDMS database files for this site, and performed an limited search for surface water receptors, ground water receptors, and nearby population. In addition I reviewed the ROD and talked to Bart (thank you Bart) regarding the status of the LAAP site, and LAAP site files regarding receptors. I also reviewed the RCRA permit and performed Google searches for a number of key searches, including Explo, Webster Parish, aerial deposition of explosions (an FBI link) to try to identify if this site has any NPL potential. A couple of noteworthy things

- 1. Explo is still an active facility
- 2. Louisiana has an active plan for stabilization of wastes.
- 3. Removal has been involved in discussions with the parties (see attached briefing sheet) and the stabilization efforts.
- 4. The town of Doyline depends on groundwater as it's potable source and serves approximately 1200 residents (see map)
- 5. The town of Doyline population of 841 is within 1/8 mile of the facility and has been evacuated during times of movement of high explosives.
- **6.** LAAP had a pink/red water shallow ground water plume and the Doyline supply is tested for explosive contaminants.
- 7. Based on review of the geology at LAAP the shallow aquifer is in communication with the potable water aquifers
- 8. There are large quantities of wastes and multiple wastes streams present on-site (see attached RCRA permit)
- 9. At this time there is not sufficient bunkers for the amount of wastes (Louisiana Police, LDEQ, Explo are trying to identify additional storage locations)
- 10. The explosives are being monitored for stability and appear to be stable, and will remain stable until they begin to degrade-
- 11. LAAP was scored under the 1982 HRS which included a direct contact/explosive pathway-the current HRS does not have a mechanism for explosive threat, however the RCRA listed wastes on the RCRA Part A are CERCLA eligible as well as the chemical constituents of some of the explosive material
- 12. No sampling was present in the files regarding migration of wastes to GW or surface water, or air.

To calculate a rough score several assumptions had to be made, that a release to either surface water, soil, air or groundwater was likely (no data exists of environmental migration-predominant file information focused on explosive threat) and that receptors could be impacted. In addition to the assumption of release, CERCLA eligibility was assumed (generally active RCRA sites proposed to the NPL have to have a clear record of non-compliance and/or the state has to pull the RCRA permit or loss of interim status if the RCRA status is interim-this is not necessarily a deal stopper-but will be a consideration). Based on these assumptions and due to the interconnectiveness of the surficial/deeper aquifer it is likely that a site score of greater than 28.5 could be documented, if sampling indicates a release to groundwater or surface

water. My reading of the online sources indicates when there is complete combustion that most of the residue is consumed and little is deposited. Which would mean that there would be little chance of aerial deposition in residential yards in Doyline, but without better understanding/modeling I am guessing.

My recommendation would be preemptively task a Preliminary Assessment of this site to better refine the source information, presence of hazardous information and establish the likelihood of release. The cost of doing a CERCLA PA would be about 15,000. We currently have sufficient contract dollars with Weston to do a PA. We will need additional contract dollars if we moved to an SI for sampling. Current dollars on contracts will likely only complete the HRS packages for Norphlet and Delta, and the first phase of sampling at SBA. We are scheduled to receive 275,000 in contract dollars in 3rd quarter. Hopefully that will happen.

Attached files (map,paiges briefing, LDEQ files)
Links to news articles

Let me know if you have any questions.

 $\underline{http://www.shreveporttimes.com/article/20121214/NEWS22/212140310/Explo-cleanup-continues}$

http://www.shreveporttimes.com/article/20121113/NEWS01/121113009/Another-explosion-Camp-Minden

http://www.crrel.usace.army.mil/library/technicalreports/TR03-16.pdf

http://www.ksla.com/story/20313777/explo-had-issues-before-storage-problem-at-camp-minden

http://www.youtube.com/watch?v=jkfQzQOp2MU

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